



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Brian G. Svoboda, Esq.
Graham M. Wilson, Esq.
Perkins Coie
700 13th Street NW
Suite 600
Washington, DC 20005-3960

JAN 16 2015

RE: MUR 6856

Dear Messrs. Svoboda and Wilson:

On January 13, 2015, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your clients, David Alameel for Congress and Nadya Alameel in her official capacity as treasurer, to resolve violations of 2 U.S.C. § 434(b) [now 52 U.S.C. § 30104(b)], a provision of the Federal Election Campaign Act of 1971. Accordingly, the file in this matter is now closed.

Documents related to the case will be placed on the public record within 30 days. *See* Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003); Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that, as specified in the agreement, the \$18,000 civil penalty is due within 30 days of the agreement's effective date. If you have any questions, please do not hesitate to contact me at (202) 694-1372.

Sincerely,

A handwritten signature in black ink, appearing to read "Roy Q. Luckett", is written over a horizontal line.

Roy Q. Luckett
Attorney, Enforcement Division

Enclosure
Conciliation Agreement

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COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

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In the matter of

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David Alameel for Congress and
Nadya Alameel in her official
capacity as treasurer

MUR 6856

OFFICE OF GENERAL
COUNSEL

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CONCILIATION AGREEMENT

This matter was initiated pursuant to information ascertained by the Federal Election Commission (the "Commission") in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that David Alameel for Congress and Nadya Alameel in her official capacity as treasurer ("Respondents" or "Committee") violated 2 U.S.C. § 434(b).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Committee is the principal campaign committee of David Alameel, who was a candidate for the U.S. House of Representatives from Texas's 33rd Congressional District during the 2012 election cycle. Nadya Alameel is the Committee's treasurer.

2. The Federal Election Campaign Act of 1971, as amended (the "Act"), requires committee treasurers to file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434; 2 U.S.C. § 434(a)(1); 11 C.F.R. § 104.1(a). These reports must include, *inter alia*, the total amount of receipts and disbursements, including the appropriate itemizations, where required. 2 U.S.C. § 434(b); 11 C.F.R. § 104.3.

3. On May 18, 2012, the Committee filed its original 2012 12 Day Pre-Primary Report covering the period from April 1, 2012 through May 9, 2012, which disclosed \$400,000 in receipts and \$1,933,665 in disbursements. The Committee filed amendments to the original report on May 19, 2012; July 2, 2012; July 15, 2012; October 12, 2012; and October 25, 2012. The amendments disclosed additional receipts totaling \$500,000 and additional disbursements totaling \$200,317.95.

4. On July 15, 2012, the Committee filed its original 2012 July Quarterly Report covering the period from May 10, 2012 through June 30, 2012, which disclosed \$574,352.97 in disbursements. The Committee filed amendments to the original report on October 12, 2012 and October 25, 2012. The amendments disclosed additional disbursements totaling \$643,810.60.

5. The Commission does not allege and there is no finding that Dr. David Alameel engaged in any wrongdoing in connection with the findings in this Agreement. Respondents contend that because Dr. Alameel was a first-time candidate for Congress in 2011, the Committee's reports were compiled and filed by individuals, none of whom had previously conducted a compliance program for a Federal political committee, and that while the Committee

initially had some reporting oversights, it filed amended reports on its own accord to correctly disclose all of the Committee's activity. Respondents further contend that Dr. Alameel largely self-funded his own campaign, and that the allegations in this matter did not involve the failure to disclose contributions from other sources.

6. The Committee has filed a termination report with the Commission, which will be processed in accordance with the applicable provisions of the Act and Commission regulations upon the resolution of this matter.

V. Respondents violated 2 U.S.C. § 434(b) by failing to disclose \$500,000 in receipts and \$844,128.55 in disbursements — an aggregate increase in activity of \$1,344,128.55 — on its original 2012 12 Day Pre-Primary and 2012 July Quarterly Reports.

VI. 1. Respondents will pay a civil penalty to the Commission in the amount of Eighteen Thousand Dollars (\$18,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondents will cease and desist in committing violations of 2 U.S.C. § 434(b).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

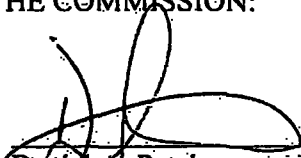
VIII. This agreement shall become effective as of the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained within this written agreement shall be enforceable.


FOR THE COMMISSION:

BY:


Daniel A. Petalas
Associate General Counsel
for Enforcement

01/15/15
Date

FOR THE RESPONDENTS:


(Name) Brian G. Surobade
(Position) Counsel

Nov. 21, 2014
Date

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